

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

EDWARD CONSTANTINESCU,
PERRY “PJ” MATLOCK,
JOHN RYBACZYK,
GARY DEEL,
STEFAN HRVATIN,
TOM COOPerman,
MITCHELL HENNESSEY,
DANIEL KNIGHT.

No. 4:22-CR-00612-S

TRIAL DEFENDANTS’ NOTICE TO REQUIRE EXHIBIT AUTHENTICATION

Defendant Edward Constantinescu, joined by defendants Perry “PJ” Matlock, John Rybarczyk, Gary Deel, Stefan Hrvatin, Tom Cooperman, and Mitchell Hennessey (collectively, the “Trial Defendants”), respectfully submit this notice pursuant to Local Criminal Rule 55.2 that each of the Trial Defendants believes it is necessary for the government to authenticate each of its proposed exhibits (Exhibits 1A-705, collectively) listed in its August 11, 2023 exhibit list. (ECF No. 351).

The Trial Defendants request authentication of the government’s proposed exhibits, as it appears that the majority of the exhibits are files created by the government (as opposed to admissible evidence), some of the exhibits appear similar to previously produced documents but appear to be slightly modified (even though the modifications do not appear to have been disclosed to defense counsel), and several of the exhibits do not appear to have been previously produced by the government’s production deadlines. The Trial Defendants reserve their rights to address further issues with, and objections to, the government’s proposed exhibits consistent with

the Local Rules and the Court's Scheduling Order, including but not limited to other issues with authenticity and their admissibility.

Dated: August 17, 2023

Respectfully submitted,



Matthew A. Ford
Texas Bar No. 24119390
mford@fordobrien.com
Jamie Hoxie Solano
Admitted Pro Hac Vice
jsolano@fordobrien.com
FORD O'BRIEN LANDY, LLP
3700 Ranch Road 620 South, Suite B
Austin, Texas 78738
Telephone: (512)-503-6388
Facsimile: (212) 256-1047

Attorneys for Defendant
Edward Constantinescu

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2023, a true and correct copy of the foregoing document has been electronically served on all counsel of record via the Court's CM/ECF system.

/s/ Jamie Hoxie Solano
Jamie H. Solano